



**DEPARTMENT OF THE NAVY  
OFFICE OF THE GENERAL COUNSEL  
1000 NAVY PENTAGON  
WASHINGTON, D.C. 20350-1000**

AGC(E)04018  
March 1, 2004

**MEMORANDUM FOR DEPARTMENT OF THE NAVY INVITEES**

**Subj: NATIONAL AIR AND SPACE MUSEUM TROPHY EVENING**

The Smithsonian Institution's National Air and Space Museum and Lockheed Martin Corporation are sponsoring a black tie evening on Wednesday, 3 March 2004, at the National Air and Space Museum to honor the recipients of the National Air and Space Museum Trophy. The event includes a reception, awards presentation, and a seated dinner. Approximately 400 invitations are sent out for this event and two hundred persons are expected to attend. The invitation list includes members of Congress, Hill staffers, various Agency personnel, members of the Smithsonian, private citizens, and members of industry. This is not a fundraising event.

This event qualifies as a widely attended gathering under 5 C.F.R. 2635.204(g)(2). In addition, pursuant to 5 C.F.R. 2635.204(g)(3)(ii), there is a reasonable basis for supervisors to find that there is an agency interest in having Department of Navy personnel attend these events. Therefore, supervisors who consider participation by one or more of their employees to be in furtherance of an agency interest may permit personnel whose duties do not substantially affect the National Air and Space Museum or Lockheed Martin Corporation to accept free attendance, including food, refreshments and entertainment furnished to all attendees as an integral part of the event. Employees may not, however, accept travel expenses or free lodging.

DON employees whose duties may substantially affect the National Air and Space Museum or Lockheed Martin Corporation should seek an individual determination pursuant to 5 C.F.R. 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Billie J. Spencer", is located below the text.

Billie J. Spencer  
Assistant to the Assistant General  
Counsel (Ethics)